# IN THE UNITED STATES DISTRICT COURT WESTERN DISTRICT OF TEXAS SAN ANTONIO DIVISION

La Unión del Pueblo Entero, et al.,	§		
	§		
Plaintiffs,	§		
	§		
V.	§		
	§	Case No. 5:21-cv-00844-XR	
STATE OF TEXAS, et al.,	§	[Lead Case]	
	§		
Defendants.	§		
	§		
HARRIS COUNTY REPUBLICAN PARTY, et al.,	§		
	§		
Intervenor-Defendants.	§		

# PRIVATE PLAINTIFFS' JOINT PRE-TRIAL DISCLOSURE OF WITNESSES PURSUANT TO FRCP 26(a)(3)

Pursuant to Federal Rule of Civil Procedure 26(a)(3), the Court's March 30, 2023 Scheduling Order (Dkt. 579), and the Court's order at the parties' July 11, 2023 hearing (Dkt, 661 at Tr. 43:12-44:1), Private Plaintiffs hereby jointly file their Pre-Trial Disclosure of Witnesses, attached as Exhibit A. Private Plaintiffs incorporate by reference all witnesses designated by Plaintiff United States, Defendants and Defendant-Intervenors. Private Plaintiffs further reserve the right to amend their disclosures to include witnesses that they could not have reasonably anticipated to be necessary, or to respond to amendments to the other parties' disclosures.

Dated: July 28, 2023 Respectfully Submitted,

### **For LUPE Plaintiffs:**

/s/ Nina Perales/s/ Sean Morales-DoyleNina Perales (TX Bar No. 24005046)Sean Morales-DoyleJulia R. Longoria (TX Bar No. 24070166)Patrick A. Berry\*Fátima L. Menéndez (TX Bar No. 24090260)Jasleen K. Singh\*

Kenneth Parreno (MA BBO No. 705747)
MEXICAN AMERICAN LEGAL DEFENSE
AND EDUCATIONAL FUND
110 Broadway, Suite 300
San Antonio, TX 78205
Tel: (210) 224-5476; Fax: (210) 224-5382
nperales@maldef.org
jlongoria@maldef.org
fmenendez@maldef.org
kparreno@maldef.org

Michael C. Keats\*
Rebecca L. Martin\*
Jason S. Kanterman\*
Kevin Zhen\*
FRIED, FRANK, HARRIS, SHRIVER &
JACOBSON LLP
One New York Plaza
New York, New York 10004
Tel: (212) 859-8000; Fax: (212) 859-4000
michael.keats@friedfrank.com
rebecca.martin@friedfrank.com
jason.kanterman@friedfrank.com
kevin.zhen@friedfrank.com

Attorneys for Plaintiffs:

LA UNIÓN DEL PUEBLO ENTERO, SOUTHWEST VOTER REGISTRATION EDUCATION PROJECT, MEXICAN AMERICAN BAR ASSOCIATION OF TEXAS, TEXAS HISPANICS ORGANIZED FOR POLITICAL EDUCATION, JOLT ACTION, WILLIAM C. VELASQUEZ INSTITUTE, FIEL HOUSTON INC. Robyn N. Sanders\*
BRENNAN CENTER FOR JUSTICE AT
NYU SCHOOL OF LAW
120 Broadway, Suite 1750
New York, NY 10271
Telephone: (646) 292-8310
sean.morales-doyle@nyu.edu
patrick.berry@nyu.edu
jasleen.singh@nyu.edu
rs8592@nyu.edu
\* Admitted pro hac vice

Leah J. Tulin\*
BRENNAN CENTER FOR JUSTICE AT
NYU SCHOOL OF LAW
1140 Connecticut Avenue NW, Suite 1150
Washington, DC 20036
(202) 650-6397
tulinl@brennan.law.nyu.edu
\* Admitted pro boo vice

\* Admitted pro hac vice

Paul R. Genender (Tex. Bar No. 00790758) Elizabeth Y. Ryan (Tex. Bar No. 24067758) WEIL, GOTSHAL & MANGES LLP 200 Crescent Court, Suite 300 Dallas, Texas 75201 (214) 746-8158 paul.genender@weil.com liz.ryan@weil.com

Attorneys for Plaintiffs: **FRIENDSHIP**-WEST F

FRIENDSHIP-WEST BAPTIST CHURCH, TEXAS IMPACT, JAMES LEWIN

<sup>\*</sup>Admitted pro hac vice

### **For OCA Greater Houston Plaintiffs:**

/s/ Zachary Dolling

**Zachary Dolling** 

Texas Bar No. 24105809

Hani Mirza

Texas Bar No. 24083512

Sarah Chen\*

California Bar No. 325327

Veronikah Warms\*

Texas Bar No. 24132682

#### TEXAS CIVIL RIGHTS PROJECT

1405 Montopolis Drive

Austin, TX 78741

512-474-5073 (Telephone)

512-474-0726 (Facsimile)

zachary@texascivilrightsproject.org

hani@texascivilrightsproject.org

schen@texascivilrightsproject.org

veronikah@texascivilrightsproject.org

Thomas Buser-Clancy

Texas Bar No. 24078344

Edgar Saldivar

Texas Bar No. 24038188

Savannah Kumar

Texas Bar No. 24120098

Ashley Harris

Texas Bar No. 24123238

### ACLU FOUNDATION OF TEXAS, INC.

5225 Katy Freeway, Suite 350

Houston, TX 77007

Telephone: (713) 942-8146

Fax: (915) 642-6752

tbuser-clancy@aclutx.org

esaldivar@aclutx.org

skumar@aclutx.org

aharris@aclutx.org

Adriel I. Cepeda Derieux\*

Ari Savitzky\*

Sophia Lin Lakin\*

Dayton Campbell-Harris

### AMERIAN CIVIL LIBERTIES UNION FOUNDATION

125 Broad St., 18th Floor

New York, NY 10004

(212) 284-7334

acepedaderieux@aclu.org

asavitzky@aclu.org

slakin@aclu.org

dcampbell-harris@aclu.org

Susan Mizner\*

### AMERICAN CIVIL LIBERTIES UNION FOUNDATION

39 Drumm St.

San Francisco, CA 94111

(415) 343-0781 (phone)

smizner@aclu.org

Brian Dimmick\*

### AMERICAN CIVIL LIBERTIES UNION FOUNDATION

915 15<sup>th</sup> St. NW

Washington, DC 20005

(202) 731-2395 (phone)

bdimmick@aclu.org

**LUCIA ROMANO** 

Texas State Bar No. 24033013

PETER HOFER

Texas State Bar No. 09777275

CHRISTOPHER MCGREAL

Texas State Bar No. 24051774

#### **DISABILITY RIGHTS TEXAS**

2222 West Braker Lane

Austin, Texas 78758-1024

(512) 454-4816 (phone)

(512) 454-3999 (fax)

lromano@drtx.org

phofer@drtx.org

cmcgreal@drtx.org

emegreal@drtx.org

Jerry Vattamala\*

Susana Lorenzo-Giguere\*

Patrick Stegemoeller\*

### ASIAN AMERICAN LEGAL DEFENSE

AND EDUCATION FUND

99 Hudson Street, 12th Floor

## For OCA Greater Houston Plaintiffs (continued):

New York, NY 10013
(212) 966-5932 (phone)
(212) 966 4303 (fax)
jvattamala@aaldef.org
slorenzo-giguere@aaldef.org
pstegemoeller@aaldef.org
Jessica Ring Amunson\*
Alyssa G. Bernstein\*
JENNER & BLOCK LLP
1099 New York Ave. NW, Suite 900
Washington, DC 20001
(202) 639-6000
jamunson@jenner.com
abernstein@jenner.com

Gregory D. Washington\*
JENNER & BLOCK LLP
455 Market St. Suite 2100
San Francisco, CA 94105
gwashington@jenner.com

COUNSEL FOR OCA-GREATER
HOUSTON PLAINTIFFS

\*admitted pro hac vice

### For Mi Familia Vota and HAUL Plaintiffs:

Courtney Hostetler
Courtney Hostetler\*
Ron Fein\*
John Bonifaz\*
Ben Clements\*
FREE SPEECH FOR THE PEOPLE
1320 Centre Street, Suite 405
Newton, MA 02459
(617) 249-3015
chostetler@freespeechforpeople.org
rfein@freespeechforpeople.org
jbonifaz@freespeechforpeople.org
bclements@freespeechforpeople.org

Wendy Olson\* Elijah
Watkins\* Mark Bieter\*
STOEL RIVES LLP
101 S. Capital Boulevard, Suite 1900
Boise, ID 83702
Telephone: (208) 389-9000
wendy.olson@stoel.com
elijah.watkins@stoel.com
mark.bieter@stoel.com

Bradley Prowant\*
John Katuska\*
STOEL RIVES LLP
33 S. Sixth Street, Suite 4200
Minneapolis, MN 55402
Telephone: (612) 373-8800
bradley.prowant@stoel.com
john.katuska@stoel.com

Laura Rosenbaum\* STOEL RIVES LLP 760 SW Ninth Ave., Suite 3000 Portland, OR 97205 Telephone: (503) 224-3380 laura.rosenbaum@stoel.com /s/ Jennifer A. Holmes
Jennifer A. Holmes\*
NAACP LEGAL DEFENSE AND
EDUCATIONAL FUND, INC.
700 14th Street NW, Suite 600
Washington, DC 20005
Telephone: (202) 682-1300
Facsimile: (202) 682-1312
jholmes@naacpldf.org

Amir Badat\*
Victor Genecin\*
Breanna Williams\*
NAACP LEGAL DEFENSE AND
EDUCATIONAL FUND, INC.
40 Rector Street, 5th Floor New
York, NY 10006
Telephone: (212) 965-2200
Facsimile: (212) 226-7592
abadat@naacpldf.org
vgenecin@naacpldf.org
bwilliams@naacpldf.org

Shira Wakschlag\*
THE ARC OF THE UNITED STATES, INC.
1825 K Street, NW, Suite 1200
Washington, DC 20006
Telephone: (202) 534-3708
Facsimile: (202) 534-3731
Wakschlag@thearc.org

Kenneth E. Broughton
Texas Bar No. 03087250
J. Keely Pippin
Texas Bar No. 24116306
REED SMITH LLP
811 Main Street, Suite 1700
Houston, TX 77002-6110
Telephone: (713) 469-3800
Facsimile: (713) 469-3899
kbroughton@reedsmith.com
kpippin@reedsmith.com

Sean Lyons Clem Lyons LYONS & LYONS, P.C. 237 W. Travis Street, Suite 100 San Antonio, Texas 78205 Telephone: (210) 225-5251 sean@lyonsandlyons.com

\*Admitted pro hac vice

Counsel for Plaintiffs Mi Familia Vota, Marla López, Marlon López, and Paul Rutledge ("MFV Plaintiffs") Sarah Cummings Stewart
Texas Bar No. 24094609
REED SMITH LLP
2850 N. Harwood Street, Suite 1500
Dallas, TX 75201
Telephone: (469) 680-4200
Facsimile: (469) 680-4299
sarah.stewart@reedsmith.com

J. Michael Showalter\*
ARENTFOX SCHIFF LLP
South Wacker Drive, Suite 7100
Chicago, IL 60606
Tel: (312) 258-5561
j.michael.showalter@afslaw.com

Counsel for Plaintiffs Houston Area Urban League; Delta Sigma Theta Sorority, Inc.; The Arc of Texas; and Jeffrey Lamar Clemmons ("HAUL Plaintiffs")

<sup>\*</sup>Admitted pro hac vice

### **For LULAC Plaintiffs:**

/s/ Uzoma N. Nkwonta

Uzoma N. Nkwonta\*

Christopher D. Dodge\*

Michael B. Jones\*

Noah B. Baron\*

Elena A. Rodriguez Armenta\*

Daniela Lorenzo\*

Marcos Mocine-McQueen\*

Marisa A. O'Gara\*

Omeed Alerasool\*

### **ELIAS LAW GROUP LLP**

250 Massachusetts Avenue NW, Suite 400

Washington, D.C. 20001

Telephone: (202) 968-4490

unkwonta@elias.law

cdodge@elais.law

mjones@elias.law

nbaron@elias.law

erodriguezarmenta@elias.law

dlorenzo@elias.law

mmcqueen@elias.law

mogara@elias.law

oalerasool@elias.law

Counsel for LULAC Plaintiffs

### **CERTIFICATE OF SERVICE**

The undersigned counsel hereby certifies that she has electronically submitted a true and correct copy of the above and foregoing via the Court's electronic filing system on the 28th day of July 2023.

/s/ Nina Perales
Nina Perales

<sup>\*</sup>Admitted Pro Hac Vice